

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

**SERGEY GAPONYUK,**

**Plaintiff,**

**v.**

**EVGENY ALFEROV, SERGEI  
KOLOSOVSKII, MIHAIL VERSHININ,  
ALEXANDER CHERNOV, DAVID BROWN,  
NATALIA ABRAMOVA**

**Defendants.**

**CASE NO.: 23-at-00566**

**PLAINTIFF'S NOTICE OF  
EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING  
ORDER AND EXPEDITED  
DISCOVERY WITHOUT NOTICE  
AGAINST DEFENDANTS**

**TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:  
PLEASE TAKE NOTICE:**

1. That as soon as the matter may be heard, movant SERGEY GAPONYUK, an individual ("Plaintiff"), by and through his undersigned attorneys, will and hereby does move this Court pursuant to Federal Rules of Civil Procedure 7 and 65(b) and Local Civil Rules 130, 230, and 231, for entry of a Temporary Restraining Order ("TRO") against Defendants EVGENY ALFEROV, SERGEI KOLOSOVSKII, MIHAIL VERSHININ, ALEXANDER CHERNOV, DAVID BROWN, and NATALIA ABRAMOVA, freezing their assets, including the Destination Addresses (defined in the Motion) maintained by them, for them, or by any entity under their control.
2. That as soon as the matter may be heard, movant SERGEY GAPONYUK, an individual ("Plaintiff"), by and through his undersigned attorneys, will and hereby does move this Court pursuant to Federal Rules of Civil Procedure 7, 30(a)(2)(A)(iii), 33(a), 33(b)(2), 34(b), and 45 and Local Civil Rules 130 and 230 for entry of an Order permitting

Plaintiff to engage in expedited discovery from any relevant third parties to enable Plaintiff to secure documents and information pertaining to Defendants EVGENY ALFEROV, SERGEI KOLOSOVSKII, MIHAIL VERSHININ, ALEXANDER CHERNOV, DAVID BROWN, and NATALIA ABRAMOVA.

These Motions are made and based on this Notice, the accompanying Memorandum of Points and Authorities, the proposed Order, and such other documents, matters, evidence, and argument as may be presented at or prior to a hearing on the Motion.

Date: July 5, 2023

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